

EXHIBIT H

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13 **UNITED STATES DISTRICT COURT**
14 **FOR THE DISTRICT OF ARIZONA**

15 Sean Bennett, an individual,) Case No. 2:23-cv-02425-ROS--DMF
16 Plaintiff,)
17 vs.)
18 City of Phoenix, a governmental entity;)
19 American Airlines, Inc., a foreign)
20 corporation; Officer Joel Cottrell and Jane)
21 Doe Cottrell, a married couple; Officer)
22 Benjamin Denham and Jane Doe)
23 Denham, a married couple; Officer Todd)
24 Blanc and Jane Doe Blanc, a married)
25 couple; Officer Peru and Jane Doe Peru, a)
26 married couple; Sergeant Hogan and Jane)
27 Doe Hogan, a married couple;)
28 Defendant(s).)

I, Jeff Ferrari, declare as follows:

1. I am employed as a Customer Service Manager at American Airlines. I submit this declaration in support of American Airlines' Motion for Summary

1 Judgment. I am personally familiar with the facts set forth herein and, if called upon,
2 I can and will testify competently as follows:

3 2. On August 13, 2021, I was working as a Customer Service Manager for
4 American Airlines at the Phoenix Sky Harbor International Airport and was at the
5 service near Gate A20 when American Airlines Flight 2391 from Phoenix, AZ, to
6 Anchorage, AK, was preparing for departure.

7 3. I was on a call with Tower Dispatcher, Kris Holt, at the time for an
8 unrelated reason, when I observed Sean Bennett kick or hit open the door separating
9 the jet way bridge and the gate area, after exiting Flight 2391, with such force that it
10 rattled the wheelchairs stacked outside the door in the gate area. Mr. Bennett
11 appeared very agitated and volatile.

12 4. Mr. Bennett was ranting about being in the military and having killed
13 people before. He was calling people the C-word and telling me he could, or he
14 wanted to, "throw [me] through that fucking window." Customers sitting in the gate
15 area started to stand up, thinking Mr. Bennett was going to become physical.

16 5. I tried to deescalate the situation but was unable to get Plaintiff to calm
17 down or talk normally. He was completely out of control and scary, and one of the
18 most aggressive and out of control individuals I have ever encountered. I was
19 concerned for myself and others.

20 6. Mr. Bennett's hostility continued to escalate, and he was yelling and
21 threatening people, so I disengaged and awaited LEOs' arrival.

22 7. Mr. Bennett then went over to the nearby Admiral Club area.

23 8. LEOs arrived shortly after, and Mr. Bennett continued to berate staff
24 and LEOs. The next thing I saw was Plaintiff on the ground in handcuffs.

25 9. Roughly 40 minutes later, I received a call that Mr. Bennett was with
26 LEOs and trying to get rebooked on another American Airlines flight.

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10. If a passenger starts to get violent, I have authority to cancel the passenger's ticket and block future bookings. Thus, I refused to rebook Mr. Bennett on another flight due to his hostile and aggressive behavior in the gate area.

I declare under penalty of perjury, under the laws of the United States, that the foregoing is true and correct.

Executed this 16 day of December 2025, at Phoenix (City),
Arizona (State).

Signed by:

Jeffrey Ferrari
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Jeff Ferrari